

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 0:24-618

18 U.S.C. § 2

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 982(a)(2)(A)

18 U.S.C. § 1028A

18 U.S.C. § 1343

18 U.S.C. § 1349

28 U.S.C. § 2461(c)

vs.

CHRISTOPHER JALEEL TERRY,
LOUIS WARREN BRYANT

INDICTMENT

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. Lowes Home Improvement (Lowes or Lowes Hardware) is a corporation with its headquarters located in Mooresville, North Carolina. Lowes operates a chain of retail stores with thousands of locations around the United States, including locations within the District of South Carolina. Lowes specializes in providing building materials and supplies.

2. Lowe's customers can use credit cards issued by Synchrony bank to make purchases at Lowes stores or, alternatively, construction companies can use a commercial charge account. These accounts allow construction companies the flexibility to receive building materials on a short-term basis without prior payment for the materials.

3. In order to bill items to a commercial charge account, an authorized buyer listed on the account has to be present photo identification or otherwise verify that they are an authorized user of the commercial account.

SCHEME AND ARTIFACE TO DEFRAUD

4. From on or about August 24, 2023 through January 23, 2024, the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, and others known and unknown to the grand jury, intentionally devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, by obtaining building materials from Lowe's Hardware using fraudulent photo identifications of Lowe's commercial charge account customers to bill or charge the corresponding commercial accounts without the permission of the commercial account holder and with the intent to permanently obtain the building materials without repaying the charges incurred on the commercial accounts.

MANNER AND MEANS

It was part of the scheme that:

5. On or about August 24, 2023 through January 23, 2024, a series of purchases were made on commercial charge accounts by defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, and others known and unknown to the grand jury, at Lowe's Home Improvement stores in Georgia, North Carolina, South Carolina, and Kentucky.

6. To make purchases on the commercial charge accounts the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, would represent

themselves to be employees or authorized representatives of the construction companies with active commercial accounts at Lowe's Hardware.

7. The defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, would shop for various building materials and pay for the materials by charging the commercial charge account for a specific business.

8. In order to bill the commercial charge account for a specific business, the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, would present a photo identification that purported to be an authorized buyer on the charge account.

9. The photo identification would bear the name and address of the authorized buyer with a photo of one of the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**.

10. Other times, the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, would utilize the phone number of the construction company to charge items to that company's commercial charge account in a self-checkout portal.

COUNT ONE

Conspiracy

11. Paragraphs 1 through 10, above, are incorporated herein by reference as setting forth a scheme and artifice to defraud.

12. That on or about August 24, 2023 through January 23, 2024, in the District of South Carolina, and elsewhere the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, and others known and unknown to the grand jury,

knowingly and intentionally combined, conspired, confederated, agreed, and had a tacit understanding to knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire, radio, or television communication in interstate commerce, any writings, signs, signals, picture or sounds for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343;

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-9
Wire Fraud

THE GRAND JURY FURTHER CHARGES:

13. Paragraphs 1 through 10, above, are incorporated herein by reference as setting forth a scheme and artifice to defraud.

14. On or about the dates set forth below, in the District of South Carolina and elsewhere, the defendants, **CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT**, and others known and unknown to the Grand Jury, for the purpose of executing the scheme described above, knowingly and intentionally caused to be transmitted by means of wire communication in interstate commerce the signals, signs, and sounds to obtain building materials to which they were not entitled:

Count	Defendant(s)	Date Purchase Made	Amount Charged
2	CHRISTOPHER JALEEL TERRY and LOUIS WARREN BRYANT	November 29, 2023	\$1,176.09
3	CHRISTOPHER JALEEL TERRY	August 24, 2023	\$1,902.89
4	CHRISTOPHER JALEEL TERRY	September 3, 2023	\$1,618.54
5	CHRISTOPHER JALEEL TERRY	September 13, 2023	\$1,216.75
6	CHRISTOPHER JALEEL TERRY	September 21, 2023	\$1,219.59
7	CHRISTOPHER JALEEL TERRY	November 15, 2023	\$1,560.81
8	CHRISTOPHER JALEEL TERRY	December 7, 2023	\$567.21
9	CHRISTOPHER JALEEL TERRY	December 7, 2023	\$579.13

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TEN
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES:

That on or about September 13, 2023, in the District of South Carolina and elsewhere, the defendant, **CHRISTOPHER JALEEL TERRY**, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Wire Fraud, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A.

COUNT ELEVEN
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES:

That on or about September 21, 2023, in the District of South Carolina and elsewhere, the defendant, **CHRISTOPHER JALEEL TERRY**, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Wire Fraud, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A.

COUNT TWELVE
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES:

That on or about November 15, 2023, in the District of South Carolina and elsewhere, the defendant, **CHRISTOPHER JALEEL TERRY**, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, Wire Fraud, knowing that the means of identification belonged to another actual person;

In violation of Title 18, United States Code, Section 1028A.

FORFEITURE

WIRE FRAUD/CONSPIRACY:

Upon conviction to violate Title 18, United States Code, Sections 1343 and 1349 as charged in this Indictment, the Defendants, **CHRISTOPHER JALEEL TERRY** and **LOUIS WARREN BRYANT**, shall forfeit to the United States any property, real or personal, constituting, derived from, or traceable to proceeds the Defendants obtained directly or indirectly as a result of such offenses.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained directly or indirectly as the result of the offenses charged in this Indictment, that is, a minimum of \$281,202.89, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to their violations of 18 U.S.C. §§ 1343 and 1349.

SUBSTITUTION OF ASSETS:


If any of the property described above as being subject to forfeiture, as a result of any act or omission of a Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of a Defendant up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c).

A True BILL

FOREPERSON

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